

**CONTINUATION OF CRIMINAL COMPLAINT**

I, Joshua Filz, being duly sworn, state as follows:

**Background and Proposed Charges**

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been so employed since April 2021. Before joining HSI, I worked for the Michigan State Police (MSP) as a Detective Trooper on the Upper Peninsula Substance Enforcement Team (UPSET) from March 2016 until April 2021. I graduated from the MSP Training Academy in 2012 and was appointed to the Calumet Post, where I served as a trooper for approximately six months, before transferring to the Wakefield Post, where I served as a trooper for approximately three years. In 2016, I was assigned to UPSET, and received Special Deputation as a Task Force Office (TFO) from the Federal Bureau of Investigations (FBI), serving as a member of the Upper Peninsula Safe Trails Task Force (UPSTTF). In 2018, I attended HSI TFO training, and upon completion was deputized as an HSI TFO for the Border Enforcement Security Team (BEST). As an UPSET detective, my primary law enforcement mission was to investigate and interdict drug trafficking impacting the Upper Peninsula of Michigan. As a Special Agent, I have the authority to seek and execute federal process, to include search warrants and criminal complaints, under Titles 18 and 21 of the United States Code.

2. I have attended numerous trainings with a focus on investigating drug crimes from various agencies and training centers, including the Federal Law Enforcement Training Center, MSP, U.S. Drug Enforcement Administration, HSI, Northeast Counter Drug Training Center, North Central HIDTA, US Attorney's Office – Western District of Michigan, and National White-Collar Crime Center. Through my training and experience, I have become familiar with the identification of illegal controlled substances, including methamphetamine, and I am familiar with illegal drug terminology, packaging, and trafficking methods. I have taken part in hundreds of narcotics investigations and have drafted numerous search warrants related to narcotics trafficking, manufacturing, and use.

3. The information set forth in this complaint is based upon my personal knowledge, my training and experience, and participation in the investigation described below, as well as information provided to me by witnesses, and other law enforcement officers. The information outlined below is provided for the limited purpose of establishing probable cause to support issuance of a criminal complaint and arrest warrant, and it does not contain all of the details or all of the facts of which I am aware relating to this investigation.

4. I submit that the facts set forth in this continuation establish probable cause to believe that, on or about December 15, 2022, in Kent County, in the Western District of Michigan, Ramond Jamal BRODEN a/k/a "Chris" knowingly and

intentionally possessed with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C). Accordingly, I respectfully request that this Court authorize a criminal complaint and issue a warrant for BRODEN's arrest.

### **Facts Establishing Probable Cause**

5. On December 15, 2022, Michigan Department of Corrections (MDOC) Absconding Recovery Unit, U.S. Marshals Fugitive Team, and Kentwood Detectives were conducting surveillance outside of a known address on Prince Albert St SE in the City of Kentwood, in Kent County, MI, attempting to locate a parole absconder. While conducting surveillance, a Jeep Grand Cherokee, which based on a Michigan Secretary of State records check through LEIN is registered to Ramond BRODEN, pulled in front of the address, and CD (the parole absconder), exited the residence, and entered the passenger side of the Jeep. Officers were familiar with BRODEN and learned through LEIN that BRODEN had a warrant for his arrest.

6. MDOC Agents and the Marshals Team converged on the vehicle to apprehend BRODEN and CD, on their outstanding warrants. CD exited the Jeep and was taken into custody. A search of CD yielded three bags of a white crystalline substance consistent with the appearance of methamphetamine, which also field tested positive as methamphetamine, totaling a combined packaged weight of approximately 228.2 grams.

7. As investigators arrested CD, BRODEN attempted to flee in his Jeep, and collided with a police vehicle. BRODEN then got out of the Jeep and fled on foot. GRPD Officer Joseph Garrett observed BRODEN reaching into his waistband as BRODEN started running. An investigator caught and tackled BRODEN, at which time investigators arrested him. During a search of BRODEN, investigators found \$16,710.00 U.S. currency.

8. Officer Garrett and Officer Romero followed the path BRODEN fled, looking for a possible firearm and contraband. Officers spoke with a contractor, who was working on a trailer-home, approximately fifty yards east of the known address on Albert St. SE. The contractor advised that during the foot chase, he saw BRODEN running at him with a pistol in his hand, so the contractor "took cover".

9. While officers were searching the area for the gun, the contractor located the gun near the front edge of the opening, underneath the trailer where he was repairing the plumbing. The contractor advised that the pistol was not there before BRODEN ran by. Deputy U.S. Marshal Fernandez recovered the pistol, which was loaded with nine rounds of ammunition, three of which were hollow-point rounds and one of which was in the chamber. An investigator later identified the pistol as a 9mm SCCY, Model: CPX-2, bearing serial number: 372968.

10. Kentwood Police Department impounded BRODEN's Jeep and

conducted an inventory search of the vehicle. In the center console, detectives located a large baseball sized bag of methamphetamine, which field-tested positive as methamphetamine. In the driver's compartment area, detectives located \$514 U.S. currency. In the driver's door, detectives located a digital scale. Detectives also seized six iPhones believed to belong to BRODEN, located in the driver's compartment area and center console. In the trunk of the vehicle, detectives located a money counter. In the back seat on the driver's side, detectives located a grocery bag with four large bags containing a white crystalline substance, consistent with the appearance of methamphetamine, which also field tested positive as methamphetamine. The methamphetamine weighed 1,273.3 grams with packaging.

11. Based on my training and experience, 1,273.3 grams of methamphetamine is a quantity indicative of possession with intent to distribute methamphetamine. Furthermore, in my training and experience, the possession of bulk U.S. currency by BRODEN shows additional evidence of drug sales.

### **Conclusion**

12. I respectfully submit that the facts set forth above establish probable cause to believe that on December 15, 2022, in Kent County, in the Western District of Michigan, Ramond Jamal BRODEN, a/k/a "Chris", knowingly and intentionally possessed with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841 (b)(1)(C).